

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11  
LEHMAN BROTHERS HOLDINGS INC., et al., : Case No. 08-13555 (JMP)  
Debtors. : (Jointly Administered)  
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**SECOND AMENDED VERIFIED STATEMENT OF CLEARY GOTTlieb  
STEEN & HAMILTON LLP PURSUANT TO BANKRUPTCY RULE 2019(a)**

Cleary Gottlieb Steen & Hamilton LLP (“Cleary Gottlieb”), as attorneys for the entities listed on Exhibit A hereto (collectively, the “Entities”), in connection with the above captioned chapter 11 cases of Lehman Brothers Holdings Inc. and related subsidiaries and affiliates (collectively, the “Debtors”), hereby submits this amended verified statement (the “Statement”) pursuant to Rule 2019(a) of the Federal Rules of Bankruptcy Procedure.

1. Cleary Gottlieb is counsel to the Entities in the above captioned cases. The address for Cleary Gottlieb for purposes of this statement is One Liberty Plaza, New York, NY 10006.
2. The mailing address for each of the Entities is listed on Exhibit A hereto.
3. Each of the Entities may hold claims against and/or interests in the Debtors arising out of applicable agreements, law or equity pursuant to their relationship with the Debtors.
4. The specific nature and amounts of the claims held by the Entities is set forth in proofs of claims filed against the Debtors’ estates.
5. The following are the facts and circumstances in connection with Cleary Gottlieb’s employment in these cases. Cleary Gottlieb represented certain of the Entities or their

affiliates prior to the Debtors' chapter 11 cases. Each of the Entities separately requested that Cleary Gottlieb represent them in connection with the Debtors' chapter 11 cases. Cleary Gottlieb also represents certain of the Entities on matters unrelated to the cases.

6. The Entities may hold claims against and/or interests in the Debtors' estates in addition to those disclosed herein that do not fall within the scope of Cleary Gottlieb's representation of such entities.

7. Cleary Gottlieb also represents or advises, or may have represented or advised other parties in interest with respect to the cases that have not been included in the Statement because the parties that Cleary Gottlieb represents do not currently intend to appear in the cases or such representations have been concluded. These parties in interest include, among others, commercial and investment banks, private equity and hedge funds, and other financial institutions, exchanges, and clearing organizations that are parties to various agreements with the Debtors.

8. Cleary Gottlieb has provided legal advice to certain of the Debtors in the past but none of the Debtors is a current client. With respect to such services, Cleary Gottlieb has prepetition claims against certain of the Debtors.

9. Cleary Gottlieb will supplement this Statement as necessary.

Dated: April 13, 2011

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: /s/ Carmine D. Boccuzzi

Carmine D. Boccuzzi  
Thomas J. Moloney  
Sean A. O'Neal  
Members of the Firm

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I, Carmine D. Boccuzzi, declare under penalty of perjury, pursuant to  
28 U.S.C. § 1746, that the facts set forth in the foregoing Statement are true and correct to the  
best of my knowledge, information and belief.

By: /s/ Carmine D. Boccuzzi

Carmine D. Boccuzzi

Executed this the 13th day of April, 2011.

EXHIBIT A: LIST OF ENTITIES

**Attorneys for:**

Absa Capital Limited  
15 Alice Lane, Sandown,  
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200 Park Avenue  
New York, NY 10166

Barclays Bank, PLC and affiliates  
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D. E. Shaw Composite Portfolios, L.L.C. and affiliates  
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New York, NY 10036

D. E. Shaw Oculus Portfolios, L.L.C. and affiliates  
120 West 45th Street  
New York, NY 10036

J. Aron & Company  
85 Broad Street  
New York, NY 10004

Goldman Sachs Bank USA (formerly known as  
Goldman Sachs Capital Markets, L.P.)  
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New York, NY 10004

Goldman Sachs International  
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Goldman Sachs International Bank  
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Goldman Sachs (Asia) Finance  
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Citibank Plaza  
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Central, Hong Kong

Goldman, Sachs & Co., for itself and on behalf  
of certain funds and accounts for which it acts  
as investment manager  
85 Broad Street  
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Goldman Sachs Japan Co. Ltd.  
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Tokyo 107-6005, Japan

Goldman Sachs (Japan) Ltd.  
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Goldman Sachs Credit Partners L.P.  
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GS European Performance Fund Limited  
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Dublin 2, Ireland

Goldman Sachs Asset Management, L.P. on behalf  
of certain funds and accounts for which  
it acts as investment manager  
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New York, NY 10005

Goldman Sachs Asset Management International  
on behalf of certain funds and accounts  
for which it acts as investment manager  
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United Kingdom

GS Investment Strategies, LLC on behalf of  
certain funds and accounts for which it acts  
as investment manager  
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New York, NY 10004

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Germany  
Harpen Immobilien GmbH & Co. KG  
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Dortmund 44141  
Germany

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Stockholm 10395  
Sweden

Zwinger Opco 6 BV  
Strawinskylaan 1161  
Amsterdam 1077 XX  
NLD

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301 South College Street  
Charlotte, North Carolina 28288

Wachovia Securities International Limited  
30 Fenchurch Street  
One Plantation Place  
London, EC3M 3BD  
United Kingdom

Evergreen Income Advantage Fund  
c/o Evergreen Investment Management Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Multi-Sector Income Fund (fka  
Evergreen Managed Income Fund)  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Utilities and High Income Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Fixed Income Trust on behalf of its  
series: Evergreen High Income Fund (fka Evergreen  
High Yield Bond Fund)  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Select Fixed Income Trust on behalf  
of its series: Evergreen Select High Yield Bond  
Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Variable Annuity Trust on behalf of  
its series: Evergreen VA High Income Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Select High Yield Bond Trust  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Core Bond Trust Full Discretion  
(fka Evergreen Core Bond Trust)  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen International Bond Trust  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Intermediate Bond Trust Full Discretion  
(fka Evergreen Intermediate Bond Trust)  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Global Dividend Opportunity Fund  
(fka Evergreen Global Dynamic Dividend  
Opportunities Fund)  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen International Balanced Income Fund  
c/o Evergreen Investment Management Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Equity Trust on behalf of its series:  
Evergreen Diversified Capital Builder Fund  
(fka Evergreen Balanced Fund)  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116



Evergreen Money Market Trust on behalf of  
its series: Evergreen California Municipal  
Money Market Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Money Market Trust on behalf  
of its series: Evergreen Municipal Money  
Market Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Money Market Trust on behalf  
of its series: Evergreen New Jersey Municipal  
Money Market Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
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Evergreen Money Market Trust on behalf  
of its series: Evergreen New York Municipal  
Money Market Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Money Market Trust on behalf  
of its series: Evergreen Pennsylvania Municipal  
Money Market Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Municipal Trust on behalf of its series:  
Evergreen California Municipal Bond Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Municipal Trust on behalf of its  
series: Evergreen High Income Municipal  
Bond Fund (fka Evergreen Florida High  
Income Municipal Bond Fund)  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Municipal Trust on behalf of its  
series: Evergreen Municipal Bond Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Municipal Trust on behalf of  
its series: Evergreen North Carolina  
Municipal Bond Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Municipal Trust on behalf of  
its series: Evergreen Short-Intermediate  
Municipal Bond Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Municipal Trust on behalf of  
its series: Evergreen Strategic Municipal  
Bond Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Municipal Trust on behalf of  
its series: Evergreen Pennsylvania  
Municipal Bond Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Fixed Income Trust on behalf of  
its series: Evergreen Core Plus Bond Fund  
(fka Evergreen Diversified Bond Fund)  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Fixed Income Trust on behalf of  
its series: Evergreen Institutional Mortgage Portfolio  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Fixed Income Trust on behalf of its  
series: Evergreen Diversified Income Builder  
Fund (fka Evergreen Strategic Income Fund)  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Fixed Income Trust on behalf of  
its series: Evergreen U.S. Government Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
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Evergreen Fixed Income Trust on behalf of  
its series: Evergreen Ultra Short  
Opportunities Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Select Fixed Income Trust on  
behalf of its series: Evergreen Adjustable  
Rate Fund  
c/o Evergreen Investment Management  
Company, LLC  
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Evergreen Select Fixed Income Trust on  
behalf of its series: Evergreen Core Bond Fund  
c/o Evergreen Investment Management  
Company, LLC  
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Evergreen Select Fixed Income Trust on  
behalf of its series: Evergreen Intermediate  
Municipal Bond Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Select Fixed Income Trust on  
behalf of its series: Evergreen Short  
Intermediate Bond Fund  
c/o Evergreen Investment Management  
Company, LLC  
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Boston, MA 02116

Evergreen Select Money market Trust on  
behalf of its series: Evergreen Institutional  
Money Market Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
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Evergreen Variable Annuity Trust on behalf  
of its series: Evergreen VA Core Bond Fund  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Variable Annuity Trust on behalf of  
its series: Evergreen VA Diversified Income  
Builder Fund (fka Evergreen VA Strategic  
Income Fund)  
c/o Evergreen Investment Management  
Company, LLC  
200 Berkeley Street  
Boston, MA 02116

Evergreen Variable Annuity Trust on behalf of  
its series: Evergreen Diversified Capital Builder  
Fund (fka Evergreen VA Balanced Fund)  
c/o Evergreen Investment Management  
Company, LLC  
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Evergreen Long Duration Trust  
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